

Judge Philip R. Martinez

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
EL PASO DIVISION

FILED

2010 SEP -1 PM 3:13

UNITED STATES OF AMERICA,

Plaintiff,

v.

ADRIAN SERRANO, (1)
LUIS MORGA, (2)
GABRIEL GARCIA, (3) and
HUGO PEREZ, (4)
Defendants.

) CRIMINAL NO. EP-10-CR-2338
)

) INDICTMENT
)

BY

SP
DEPUTY

) CT 1: 18:1956(h)-Conspiracy to Launder
) Monetary Instruments;
)
)
)
)

EP 10 CR 2338

THE GRAND JURY CHARGES:

COUNT ONE

(18 U.S.C. § 1956(h))

That beginning on or about December 2006 and continuing through May 2007, in the Western District of Texas and the Eastern and Western Districts of North Carolina and elsewhere, the Defendants,

**ADRIAN SERRANO,
LUIS MORGA,
GABRIEL GARCIA, and
HUGO PEREZ,**

did knowingly combine, conspire, and agree with each other and with others known and unknown to the Grand Jury to commit offenses against the United States in violation of Title 18, United States Code, Section 1956, to wit:

(a) to knowingly conduct and attempt to conduct a financial transaction affecting interstate commerce, which involved the proceeds of a specified unlawful activity, that is, conspiracy to possess with the intent to distribute a controlled substance with the intent to promote the carrying on of specified unlawful activity, that is, conspiracy to possess with the intent to distribute a

controlled substance, and that while conducting and attempting to conduct such financial transaction, knew that the property involved in the financial transaction represented the proceeds of some form of unlawful activity in violation of Title 18, United States Code, Section 1956(a)(1)(A)(I); and

(b) to knowingly conduct and attempt to conduct financial transactions affecting interstate commerce, which transactions involved the proceeds of specified unlawful activity, that is, conspiracy to possess with the intent to distribute a controlled substance, knowing that the transactions were designed in whole or in part to conceal and disguise the nature, location, source, ownership, and control of the proceeds of specified unlawful activity, and that while conducting and attempting to conduct such financial transactions, knew that the property involved in the financial transactions represented the proceeds of some form of unlawful activity, in violation of Title 18, United States Code, Section 1956(a)(1)(B)(I).

MANNER AND MEANS

The manner and means used to accomplish the objectives of the conspiracy included, among others, the following:

The Defendants all allowed the deposit of United States currency into their respective Bank of America bank accounts. The Defendants knew that the property deposited into their respective Bank of America bank accounts represented the proceeds of a specified unlawful activity, that is, conspiracy to possess with the intent to distribute a controlled substance. The cash deposits were made by persons unknown and were made in cash to disguise the source of the cash. The deposits were all made into the Defendants' respective bank accounts in the Eastern and Western Districts of North Carolina and the Defendants subsequently made withdrawals of United States currency, in the Western District of Texas, from their respective bank accounts. The cash from the withdrawals

were subsequently transported to the Republic of Mexico. The cash withdrawals from the Defendants' respective bank accounts were as follows:

DEFENDANT	DATE	WITHDRAWAL
GARCIA	12/22/06	\$1,600.00
PEREZ	12/26/06	\$1,489.00
GARCIA	01/12/07	\$2,000.00
SERRANO	01/12/07	\$2,000.00
PEREZ	01/17/07	\$2,800.00
SERRANO	01/25/07	\$4,500.00
GARCIA	01/25/07	\$6,500.00
PEREZ	01/30/07	\$4,950.00
SERRANO	02/13/07	\$5,000.00
SERRANO	02/13/07	\$5,000.00
GARCIA	02/13/07	\$10,000.00
SERRANO	02/15/07	\$5,000.00
PEREZ	02/16/07	\$7,994.00
PEREZ	02/16/07	\$7,000.00
GARCIA	02/16/07	\$10,000.00
GARCIA	02/26/07	\$3,000.00
GARCIA	03/06/07	\$5,000.00
PEREZ	03/06/07	\$9,685.00
MORGA	03/06/07	\$7,000.00
SERRANO	03/06/07	\$5,000.00
SERRANO	03/07/07	\$5,900.00
PEREZ	03/07/07	\$5,000.00

MORGA	03/07/07	\$9,900.00
GARCIA	03/07/07	\$4,200.00
SERRANO	03/09/07	\$7,360.00
MORGA	03/12/07	\$2,000.00
GARCIA	03/12/07	\$5,000.00
MORGA	03/13/07	\$4,890.00
GARCIA	03/14/07	\$4,600.00
SERRANO	03/27/07	\$9,000.00
MORGA	03/27/07	\$4,501.00
PEREZ	03/28/07	\$8,500.00
GARCIA	03/30/07	\$4,300.00
PEREZ	03/30/07	\$3,500.10
GARCIA	03/30/07	\$3,500.00
SERRANO	04/03/07	\$3,000.00
PEREZ	04/03/07	\$4,000.00
GARCIA	04/04/07	\$5,000.00
MORGA	04/11/07	\$3,770.00
MORGA	04/11/07	\$4,950.00
GARCIA	04/16/07	\$5,000.00
PEREZ	04/26/07	\$4,000.00
SERRANO	04/26/07	\$4,000.00
MORGA	04/26/07	\$6,900.00
GARCIA	04/26/07	\$7,500.00
SERRANO	04/27/07	\$3,300.00
MORGA	04/27/07	\$500.00
SERRANO	04/30/07	\$5,098.00

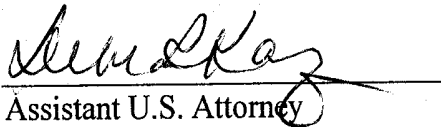
PEREZ	04/30/07	\$5,000.00
GARCIA	04/30/07	\$3,900.00
SERRANO	05/02/07	\$4,000.00
SERRANO	05/02/07	\$3,500.00
PEREZ	05/02/07	\$3,500.00
PEREZ	05/02/07	\$3,500.00
MORGA	05/02/07	\$4,883.00
GARCIA	05/02/07	\$7,300.00
PEREZ	05/08/07	\$100.00
PEREZ	05/16/07	\$3,700.00

All in violation of Title 18, United States Code, Section 1956(h).

A TRUE BILL.

FOREPERSON OF THE GRAND JURY

JOHN E. MURPHY
UNITED STATES ATTORNEY

BY: 
Assistant U.S. Attorney